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Ms C Smith
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(BY EMAIL: planning.policy@medway.gov.uk)

29 February 2016

Dear Ms Smith

MEDWAY ISSUES AND OPTIONS LOCAL PLAN 2016

Thank you for consulting Maidstone Borough Council on the Medway Issues and Options Local Plan (2012-2035). The Council has a number of comments which are set out in this letter.

The Duty to Co-operate

The Issues and Options Local Plan sets out that the Medway Council is currently engaging with partner organisations and Maidstone Borough Council welcomes the opportunity to discuss matters under 'The Duty' in respect of both Maidstone Borough Council's emerging Local Plan and during the preparation of Medway Council's new Local Plan.

Housing

4) Do you agree with the approach and conclusions of the assessment of housing needs calculated for Medway over the plan period?

We note that the Issues and Options Local Plan sets out the objectively assessed housing need of 29,463 (paragraph 7.8) to meet the development needs of the Medway area. Maidstone Borough Council is supportive of the approach set out in paragraph 7.10 that Medway Council is committed to planning positively to meet its own full objectively assessed housing need within Medway's administrative boundary.

It should be noted that we are currently out to consultation on our Regulation 19 Local Plan and that we will be able to meet our objectively assessed housing need of 18,560 dwellings in full and we are not seeking assistance to do so from any neighbouring planning authority.

5) What do you consider to be the appropriate housing market area for Medway?

Medway Council will be aware of our previous concerns in regards to the Medway Draft Kent Strategic Housing and Economic Needs Assessment (SHENA) as set out by email on 27 October 2015.

Paragraph 2.105 and 2.106 of the SHENA recognises that whilst there are strong relationships between Medway and Maidstone, they are however not consistent across the full local authority area. We welcome the recognition in the SHENA that the strongest relationship is with the north of the borough.

MBC has undertaken its own SHMA (in 2014/2015) in partnership with Ashford and Tonbridge & Malling Borough Councils. This work identifies a Maidstone HMA which includes the majority of the borough with the exception of the easternmost wards of the borough which fall within the ambit of the Ashford HMA. Additionally the HMA extends to the west to include the Medway Gap area of Tonbridge & Malling. In contrast to the Final Medway SHENA, it does not conclude that the Medway area forms part of the same HMA. The analysis which leads to this conclusion is set out in paragraphs 2.39-2.43 of the Maidstone SHMA:

(http://www.maidstone.gov.uk/_data/assets/pdf_file/0007/44656/Strategic-Housing-Market-Assessment-2014.pdf) and can be summarised as follows:

- There is a functional relationship between the northern part of Maidstone and the Medway towns (and Swale) indicated, in particular, by commuting and migration movements;
- Analysis of the housing market characteristics (nature of the stock and cost) however, identifies a notable distinction between the Medway area and Maidstone; and
- Overall, there is not the widespread market integration to include Medway and Maidstone in the same market area.

Table 14 in the Medway SHENA illustrates a considerable difference in median house prices between the two local authority areas; the 2013 median for Medway is £160,000 compared with £210,000 for Maidstone. Furthermore, taking the proposed HMA as a whole, the median average house price ranges from £160,000 (Medway) to £249,000 (Tonbridge & Malling).

The Medway SHENA also identifies indicators which point to Medway having a high degree of self-containment in its own right:

- Tables 7, 8 and 9 identify the highest level of containment in terms of migration moves when the Medway area is considered alone.
- 51% of Medway residents work in Medway (table 11) whereas only 7% of Medway residents work in Maidstone borough (the next highest proportion).
- 70% of people who work in Medway live in Medway, the next highest figure is Swale at only 6%. Only 5% of people who work in Medway live in Maidstone.

Whilst housing market areas are not necessarily discrete, the Medway HMA is considerably at odds with that defined in Maidstone's SHMA and is also understood to be at odds with the HMAs defined in both Swale and Tonbridge & Malling's SHMAs. In our opinion, the analysis appears not to have given equivalent weight (as cited in the guidance) to the signals from market factors. The wide area encompassed in the HMA, which extends to cover Medway, Gravesham, Swale, Maidstone; and Tonbridge & Malling, does not appear to reflect the strongest interrelationships. This council does not, therefore, agree with the Medway housing market area which has been defined.

Inclusion of housing projection figures

The Borough Council also previously expressed concerns about the inclusion of household projection figures in the draft SHENA. Table 46 (page 97) of the final SHENA document includes 'updated' household projection figure

for Maidstone of 844 households per annum for the period 2012-2037. This differs, albeit marginally, from the published DCLG household projections figures for this period of 836 households per annum and the reasons for this are not transparent.

In addition two further projections are included for household and dwelling growth which have been calculated using the consultants own methodology. These figures have been calculated using a methodology which has not (and cannot) be endorsed by the borough council. The figures do not relate to Maidstone's own assessment of the borough's OAN which takes account of, for example, market factors or to the housing need across the Maidstone HMA.

The SHENA states that these figures are included to provide an understanding of wider housing needs in the sub region but, in our view, this could be achieved equally as well by referring to adjoining local authorities' own OAN. In Maidstone's case the figures are 928dpa (18,560 dwellings 2011-31). We must underline that this is the confirmed position on the scale of housing need in the borough and is the clear evidential basis for the borough's Local Plan which has now reached an advanced stage of preparation. We strongly recommend that our identified OAN should be the figure used in any future contextual or comparative analysis as the Medway Local Plan progresses.

14) What is the level and type for gypsy, traveller and travelling showpeople's accommodation in Medway and what criteria should be used to identify appropriate sites?

It is noted that the scale of Medway's need for Gypsy & Travellers pitches is yet to be confirmed in the light of the revised definition and it is also understood that site assessment work is in train which could identify potential sites for allocation. This Council's position is that identified needs will be met through permanent consents, site allocations, turnover the two public sites in the borough and an allowance for consents coming forward on unidentified sites.

Economy

15) Where should such sites be located, considering opportunities in existing employment area and potential new sites such as Lodge Hill or other developments?

It is noted that the employment land requirements are based on an employment forecast which is above what might be expected from past trends and anticipates a future strengthening of the manufacturing and industrial sectors in Medway. The supporting evidence in the SHENA identifies that the existing supply of sites may not be able to cater for these future requirements and that additional allocations are likely to be required. The SHENA suggests that this could include the allocation of new space in and at the edge of town centres, refining the uses on existing identified sites and possibly mixed use allocations in locations such as Lodge Hill. As these sites are yet to be identified, the Council simply notes the evidence at this stage and would welcome being consulted on more specific details at future stages in the plan making process.

Transport

71) What infrastructure is required to support Medway's growth over the plan period?

Maidstone Borough Council supports the ambitions contained within this chapter to increase sustainable modes of transport. To accommodate the level of growth proposed, the Local Plan will need to promote significant measures to further encourage modal shift to public transport and walking and cycling.

Maidstone and Medway has good public transport connections through both rail and bus services and we welcome further discussions in future on how to enhance public transport provision between the two areas.

Thank you again for consulting the borough council and we look forward to on-going, productive discussions with yourselves as our plans progress.

Yours sincerely,



Rob Jarman
Head of Planning & Development

